

NOV -10 1999

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article Number: P 619 183 549

Mr. Geoff Jones
Corporate Project Manager
Safety-Kleen Corporation
P.O. Box 11393
Columbia, South Carolina 29211

Dear Mr. Jones:

RE: Safety-Kleen Corporation
Wichita, Kansas
RCRA ID# KSD007246846

The Environmental Protection Agency(EPA) and the Kansas Department of Health and Environment, Bureau of Environmental Remediation (BER) have reviewed the revised RCRA Facility Investigation Work Plan (RFIWP) dated October 14, 1999. Both EPA and BER approve the RFIWP with the following conditions.

- 1) The recently submitted 1983 aerial photo and photo interpretation figure shows a significant amount of activity and/or storage in the southwest corner of the Safety-Kleen facility. The RFIWP proposes six borings to evaluate this portion of the facility; however, the locations are based on a grid system rather than biased toward the most likely problem areas. BER did an overlay of the proposed sample locations and the aerial photo interpretation. All six of the proposed borings are either outside the identified storage areas or just on the edge of the storage areas. BER believes that these borings should be relocated based on the evidence in the 1983 air photo, or additional borings should be proposed. At a minimum, BER has determined that a boring located along the west fence line, and a boring located along the southern fence line are necessary. The 1983 aerial photo also shows the tanks located in the north eastern corner of the site. Safety-Kleen has proposed borings B-40, B-41, and B-42 to evaluate this area. Borings B-40 and B-42 might be better located closer to the former tank area where releases could have occurred while transferring materials between the storage tanks and trucks.

ARTD:H:RCAP BRANCH/LOWE UNIT/LOWE/SKLEEN\RFI iwp-aprvl.Nov99: bfr 11/9/99

RCAP
LOWE

RCAP
PEDICINO

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11/9/99

Wfz



R00145972
RCRA RECORDS CENTER

Representatives from BER will be available at the beginning of the field work to assist in finalizing boring locations.

- 2) **Section 5.4.1, Discrete Vertical Groundwater Sampling:** In regard to ground water sampling and monitoring wells, BER acknowledges that Safety-Kleen has agreed to use a geoprobe to collect ground water samples from eight locations at three different depths. BER believes this information will be helpful in evaluating the site; however, BER makes the following comments:

- The RFIWP proposes three ground water sample locations at "... selected locations across the site." The locations will be chosen in the field based on field conditions and PID readings from soil borings. BER and EPA understand this to mean that after all other Phase I work has been completed, these three locations will be selected at the areas with the highest "hits" across the facility. It is unrealistic to expect the proposed soil borings to be located precisely on areas where releases may have occurred and there are more than three potential source areas for ground water contamination at the Safety-Kleen facility. Therefore, there are potential source areas that will not be addressed as part of this initial investigation. Please note that EPA and BER require all identified source areas to be investigated and characterized in accordance with the Source Control Measures Scope of Work and with Part II of your Permit. Therefore, if the initial investigation does not clearly identify and characterize the facility-related source of ground water contamination identified in previous investigations and sampling events, EPA and BER will require additional ground water investigation.
- The RFIWP does not directly address the issue of shallow and deep wells. All the wells proposed except one are shallow; however, the revision does include collection of shallow, intermediate, and deep ground water samples by geoprobe. BER and EPA believe that both shallow and deep wells will be necessary for evaluation of this site, however, we will accept the combination of shallow monitoring wells for gradient determination and geoprobe water samples to evaluate contaminant stratification for the initial phase of investigation. The discussion of Well locations and depths must be revisited after review of the initial data.

- 3) **Section 5.4.2, Monitoring Well Installation and Development:** Since there is the possibility of floating contaminants, the shallow wells must be screened with the top of the well screen above the anticipated highest seasonal water level.

The EPA recommends that a five-foot screen, set slightly into bedrock and without any blank sump below the screen be used in the deep well. This will provide a better vertical profile between information from the shallow wells and the deep well. It will also reduce potential dilution that can be happen with longer screens.

- 4) **Section 5.4.3.3, Groundwater Sample Collection:** Safety-Kleen must analyze groundwater samples for total metals. Therefore, the EPA will not accept the analytical results from filtered groundwater samples.
- 5) **Section 5.4.4, Analytical Testing of Groundwater Samples:** Safety-Kleen will be required to perform an analysis on groundwater samples for all constituents detected at significant levels in soils. This can be done in subsequent phases of the investigation.

This letter will be considered part of the approved RFIWP unless you would like to discuss the conditions set forth above, before beginning your field work. If you have questions or comments on these conditions, please notify me at (913) 381-8347 within fifteen [15] days of your receipt of this letter.

Sincerely,

William F. Lowe
Unit leader
RCRA Corrective Action and Permits Branch
Air, RCRA, and Toxics Division

cc: Kay Tauscher, Safety-Kleen Inc.
Christine R. Jump, BER

Ms. Kay Tauscher
Safety-Kleen Inc.
5665 Flatiron Parkway
Boulder Colorado 80301

Christine R. Jump,
State Remedial Unit/Remedial Section
Kansas Dept. of Health and Environment
Forbes Field, Building 740
Topeka, Ks. 66620-0001



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

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Sincerely,


William F. Lowe

Unit leader

RCRA Corrective Action and Permits Branch
Air, RCRA, and Toxics Division

cc: Kay Tauscher, Safety-Kleen Inc.
Christine R. Jump, BER

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
 2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Geoff Jones
 Corporate Project Manager
 Safety-Kleen Corporation
 P.O. Box 11393
 Columbia, South Carolina 29211

4a. Article Number

P 619 183 549

4b. Service Type

- ☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☒ Return Receipt for Merchandise ☐ COD

7. Date of Delivery

NOV 16 1999

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

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NOV 19 1999

RCAP

US Enviornmental Protection Agency
Region VII --- ARTD/RCAP
901 N. 5th Street
Kansas City, KS 66101

Love: incip - apur. 11/19/99
R.F.I

P 619 183 549

US Postal Service

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Sent to

Mr. Geoff Jones
Corporate Project Manager
Safety-Kleen Corporation
P.O. Box 11393
Columbia, South Carolina 29211

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Restricted Delivery Fee

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Date, & Addressee's Address

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NOV 10 1999

PS Form 3800, April 1995